

EXHIBIT B

Michael Radine

From: Michael Radine
Sent: Monday, December 6, 2021 3:23 PM
To: Goldstein, Linda; Ari Ungar; Gary Osen; Aaron Schlanger; Dina Gielchinsky
Cc: McGinley, Michael; Romeo, Justin M.; Brown, Selby; Mallat, Tamer
Subject: RE: Honickman, et al. v. BLOM Bank SAL, 19-cv-00008-KAM-SMG -- Letter to Judge Matsumoto

Counsel:

Thank you for bringing this to our attention. We agree that the filings in the district court occurred in the sequence you have described in your draft letter, and we are happy to write to the Court to correct the record in this respect. However, we disagree that the error in our brief's recitation of *LeBlanc*'s procedural history constitutes a "material misstatement" in that the sequencing you describe does not, in our view, change the Circuit's analysis in *LeBlanc* or our description of that analysis.

Please advise whether you would like us to write to the court, set forth the sequence you describe and note the error in the brief.

Regards,

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From: Goldstein, Linda <Linda.Goldstein@dechert.com>
Sent: Monday, December 6, 2021 10:46 AM
To: Michael Radine <mradine@osenlaw.com>; Ari Ungar <aungar@osenlaw.com>; Gary Osen <gosen@osenlaw.com>; Aaron Schlanger <aschlanger@osenlaw.com>; Dina Gielchinsky <dgielchinsky@osenlaw.com>
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Subject: Honickman, et al. v. BLOM Bank SAL, 19-cv-00008-KAM-SMG -- Letter to Judge Matsumoto

Dear counsel,

We have prepared a letter to Judge Matsumoto advising the court of an error in the discussion of the procedural history of *LeBlanc v. Cleveland* in your reply brief. A copy of the draft letter, together with a copy of the NDNY docket confirming the sequence of filings, is attached. Please let us know by 4 PM today whether you agree with our draft letter's recitation of the sequence of filings in *LeBlanc v. Cleveland*. If you disagree with the chronology as stated in our draft, please explain why, with references to the NDNY docket sheet.

Kind regards,

Linda

Linda C. Goldstein

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